

Marguerite McLean

090430-TP

From: WOODS, VICKIE (Legal) [vf1979@att.com]
Sent: Wednesday, November 17, 2010 3:52 PM
To: Filings@psc.state.fl.us
Subject: 090430-TP AT&T Florida's Responses to Staff's Data Request, dated November 2, 2010
Importance: High
Attachments: Untitled.pdf

A. Vickie Woods

BellSouth Telecommunications, Inc. d/b/a AT&T Florida

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

(305) 347-5560

vf1979@att.com

B. Re: Docket No. 090430-TP: Petition for verified emergency injunctive relief and request
for stay of AT&T's CLEC OSS-related releases by Saturn Telecommunications Services,
Inc.

C. BellSouth Telecommunications, Inc. d/b/a AT&T Florida
on behalf of Tracy W. Hatch

D. 14 pages total (includes letter, certificate of service and Response)

E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Response to Staff's Data Request, dated November 2, 2010

.pdf

<<Untitled.pdf>>

11/17/2010

DOCUMENT NUMBER DATE

09489 NOV 17 2010

FPSC-COMMISSION CLERK



at&t

Tracy W. Hatch
General Attorney

AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

T: (850) 577-5508
thatch@att.com

November 17, 2010

Ms. Ann Cole, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **Docket No. 090430-TP** - In re: Amended petition for verified emergency injunctive relief and request to restrict or prohibit AT&T from implementing OSS-related releases, by Saturn Telecommunications, Inc.

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Responses to Staff's Data Requests, dated November 2, 2010, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Tracy W. Hatch

Enclosure

cc: All Parties of Record
Jerry D. Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.


**CERTIFICATE OF SERVICE
Docket No. 090430-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and First Class U.S. Mail this 17th day of November, 2010 to the
following:

Adam Teitzman
Pauline Evans
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ateitzma@psc.state.fl.us
pevans@psc.state.fl.us

Law Offices of Alan C. Gold, P.A.
Alan Gold
1501 Sunset Drive Second Floor
Coral Gables, FL 33143
Tel. No. (305) 667-0475
Fax. No. (305) 663-0799
agold@acgoldlaw.com

STS Telecom
Mr. Keith Kramer
P. O. Box 822270
Pembroke Pines, FL 33082-2270
Tel. No. (954) 252-1003
Fax No. (786) 363-0103
kkramer@ststelecom.com



Tracy W. Hatch

Florida Public Service Commission Data Request
Docket No. 090430-TL
November 2, 2010

Issue 1: *LEX does not allow STS to use a Loop Type of "Other" for a Commingled DSO SL2 Circuit.*

1. Is STS allowed to order a UNE SL2 DSO commingled arrangement with a request type "B" through the LEX ordering interface?

Response: Yes. STS is allowed to order a UNE SL2 DSO commingled with a request "B" through the LEX ordering interface. As previously noted, AT&T developed a Web-based Graphical User Interface (GUI) named LEX for CLECs that have chosen not to develop their own interface and connect with AT&T via XML.

2. If the answer to question 1 is "no", can STS "manually" order a UNE SL2 DSO commingled arrangement with a request type "B". If so, please provide the step-by-step manual ordering instructions.

Response: N/A

3. If the answer to question 1 is "yes" please provide the step-by-step LEX ordering process, and further explain why LEX does not allow for the SPEC and NCI codes.

Response: AT&T has previously provided STS and the FPSC Staff with steps for ordering UNE SL2 DSO commingled arrangement with a request type "B" in LEX. Attachment A, available at CLEC OnLine to the general public (<https://clec.att.com/clec/hb/shell.cfm?section=2558&hb=507>), contains the Customer Information Package for Migrations to Commingled UVL-SL2 Loop with Number Portability (Request Type B). In addition to the standard LSR information found in the Local Service Order Requirements (LSOR) for Request Type "B", CLECs are directed to follow the requirements in the Customer Information Package for appropriate field entries.

The NCI field is expected to be populated following the valid entries contained in the Customer Information Package. The SPEC field is a conditional field and is not expected to be populated when ordering UNE SL2 DSO commingled arrangement with a request type "B"

SPEC and NCI are fields that are recognized by the Industry consortium, the Ordering and Billing Forum (OBF). Carriers, including AT&T have published the LSOR that identifies which fields AT&T requires based on Product and/or Activity requested.

The SPEC field is defined as the Service and Product Enhancement Code (Field 65 on the LSR). In accordance with the LSOR and the Customer Information Package for

DOCUMENT NUMBER-DATE

09489 NOV 17 09

FPSC-COMMISSION CLERK

Migrations to Commingled UVL-SL2 Loop with Number Portability (Request Type B), population of the SPEC field is not required when ordering UNE SL2 DSO commingled arrangement with a request type "B" in LEX.

The NCI field is defined as the Network Channel Interface Code (Field 68 on the LSR). In accordance with the Customer Information Package for Migrations to Commingled UVL-SL2 Loop with Number Portability (Request Type B), population of the NCI field is to be populated with either 02QC3.OOD (Loop Start) or 02QC3.OOB (Ground Start).

4. Please provide copies of all Accessible Letters and any additional information provided to CLECs regarding the changes in the ability to order UNE SL2 DSO commingled arrangements through the LEX ordering interface.

Response: Attachment A, available at CLEC OnLine to the general public (<https://clec.att.com/clec/hb/shell.cfm?section=2558&hb=507>), contains the Customer Information Package for Migrations to Commingled UVL-SL2 Loop with Number Portability (Request Type B) and was published on April 14, 2006 and updated on April 26, 2010.

On April 15, 2010, Accessible Letter CLECSE10-049 was released. The subject was "New UNE Ordering Guide and update the Southeast Special Handling Document for Migrations to Commingled UVL SL2 Loops with Number portability".

On May 3, 2010, Accessible Letter CLECSE10-063 was released. The subject was "Revision to CLEC10-049 - New UNE Ordering Guide and update the Southeast Special Handling Document for Migrations to Commingled UVL SL2 Loops with Number portability".

5. Please provide copies of any CLEC complaints to AT&T regarding the inability to order UNE SL2 DSO commingled arrangements through the LEX ordering interface.

Response: AT&T is unaware of any CLEC complaints to AT&T regarding the inability to order UNE SL2 DSO commingled arrangements through the LEX ordering interface. AT&T has provided the instructions to CLECs that wish to order this arrangement through LEX.

Issue 2: *The sequence in which the LSR and the End User Forms are processed by CLECs can cause the ACTL and LSO fields on the LSR page to be re-populated.*

1. Please provide the specific instructions for ordering requisition types A, B and C in LEX.

Response: AT&T provides formal classroom training for LEX to interested CLECs. In addition, <https://clec.att.com/clec/hb/shell.cfm?section=1956> contains training material and information on using LEX.

AT&T provides a LEX User Guide at CLEC On Line
<https://clec.att.com/clec/hb/shell.cfm?section=258&hb=507>

AT&T provides Local Service Order Requirements (LSOR) and Local Exchange Ordering Guides at CLEC On-Line <https://clec.att.com/clec/hb/shell.cfm?section=742&hb=507>

AT&T provides Product/LSR examples at CLEC On-Line
<https://clec.att.com/clec/hb/lsex/>

AT&T provides additional miscellaneous General Ordering for UNE and Resale at CLEC On-Line <https://clec.att.com/clec/hb/shell.cfm?section=2756&hb=507>

AT&T provides additional Customer Information Packages for certain Requisition Types B and C at CLEC On-Line <https://clec.att.com/clec/hb/shell.cfm?section=2558&hb=507>

2. Please explain why the ACTL and LSO fields that have to be re-populated on the LSR page would not be considered a defect in the LEX ordering process.

Response: ACTL and LSO are fields that are recognized by the Industry consortium, the Ordering and Billing Forum (OBF). Carriers, including AT&T have published Local Service Order Requirements (LSOR) that identifies which fields AT&T requires based on Product and/or Activity requested.

The ACTL field is defined as the Access Customer Terminal Location (Field 58 on the LSR). This field identifies the CLLI code of the customer facility terminal location or designated collocation area. The field length is 8 or 11 characters depending on the business rules. This is a required field for some Requisition Type A (UNE Loop) and all Requisition Type B (Loop with Number Portability).

The LSO field is defined as the Local Serving Office (Field 63 on the LSR). This field identifies the NPA/NXX of the local or alternate service central office of the customer location or primary location of the end user. The field length is 6. This is a required field for some Requisition Type A (UNE Loop) and all Requisition Type B (Loop with Number Portability).

By design, based on Requisition type, when a user performs pre order service address validation in LEX, the ACTL and LSO fields are automatically populated with AT&T's ACTL and the NPA/NXX assigned to the service address. The vast majority of the LSRs issued, AT&T's ACTL and the NPA/NXX assigned to the service address are the appropriate field inputs, therefore saving the LEX User the requirement to populate these fields. For

example, if a CLEC ordered a Loop with Number Portability, the CLEC would be collocated at the Serving Wire Center that is represented as an ACNA belonging to AT&T. The number being ported previously belonged to AT&T so the LSO, basically the NPA/NXX at the Serving Wire Center, would remain unchanged. Per the business rules in the LSOR, for Commingled orders, the ACTL must reflect the Serving Wire Center CLLI where the Special Access circuit originates (Connected Facility Assignment) which may or may not be the End User's Serving Wire Center.

3. Please explain the following statement obtained from AT&T's Final Minutes of the September 15, 2010 Change Management/Change Control Process Meeting: "AT&T agreed that during address validation the ACTL and LSO field are populated with the information from the pre-order system which is what is used by most CLECs"

Response: In deference to the FPSC Staff's concern on this issue, AT&T agreed to socialize the concern at the following Change Management Meeting (CMP). CMP is a long standing, on going Industry Forum. This forum is used for AT&T to provide updates to our Operational Support Systems (OSS), solicit feedback and review Change Requests for consideration and/or prioritization. As committed, AT&T socialized Staff's concern regarding the requirement to type over two pre populated fields when ordering a specific product set in LEX. The statement reflects that AT&T met its commitment to the Staff, and that the auto population of the fields in LEX is beneficial to a majority of the CLECs using LEX. During the CMP, no other CLECs expressed concerns with this functionality.

As you know, LEX was developed as a Graphical User Interface for CLECs choosing not to develop their own front end application and connect with AT&T via XML. By design, AT&T introduced certain functionality to assist the greatest amount of users issuing the greatest amount of product types. Nothing precludes CLECs, including STS, to develop their own front end application based on their unique business plan.

4. Please provide all Accessible Letters and any additional information provided to CLECs regarding the need for re-population of the ACTL and LSO fields for Requisition types A, B and C.

Response: The ACTL and LSO fields are not required on Requisition type C (Number Portability). For Requisition type A (Loop) and B (Number Portability), if in a Commingled scenario, and if the CLLI where the Special Access circuit originates is not the same as the End User's Serving Wire Center, then a LEX User, who had previously performed address verification in LEX, would have to update the ACTL to reflect the CLLI where the Special Access circuit originates. This information is contained within the Local Service Order Requirements at CLEC On-Line <https://clec.att.com/clec/hb/shell.cfm?section=742&hb=507>

5. Has STS submitted a change request through CMP regarding this issue? If so, what was AT&T's response?

Response: No. STS has not submitted a Change Request.

6. Please provide any CLEC complaints to AT&T regarding the need to re-populate the ACT and LSO fields in LEX.

Response: AT&T is unaware of any CLEC complaints to AT&T regarding the requirement for Requisition type A (Loop) and B (Number Portability), *if in a Commingled scenario, and if the CLLI where the Special Access circuit originates is not the same as the End User's Serving Wire Center, then a LEX User, who had previously performed address verification in LEX, would have to update the ACTL to reflect the CLLI where the Special Access circuit originates.*

7. Please provide any cost-benefit analyses conducted by AT&T regarding this issue.

Response: No cost benefit analysis has been conducted by AT&T on this issue to date. Prior to performing an in depth cost-benefit analysis, AT&T, as committed, wanted to socialize the issue with the CLEC Community in the CMP forum as appropriate. One approach would be to cease auto populating the ACTL and LSO fields for all LEX orders. This would require the LEX user to input data every time in accordance with the Business Rules. This would be relatively easier than developing if/then logic within LEX. However this would be detrimental to the larger group of users. The benefit would be to those CLECs placing orders in LEX for the narrow scenarios previously discussed. The CLEC Community did not indicate this is an issue it wanted to pursue.

Issue 3: *The R/C/O tables contained within the LOH will not be retained in the same format when converted to the LSOR*

1. AT&T stated that it will offer a one-time flat file of the existing R/C/O tables in a Microsoft Word format and CLECs can update the document as changes are introduced to the LSOR. Please provide an explanation as to how CLECs will be able to update the Word version of the R/C/O tables.

Response: CLECs that have access to Microsoft Word could open the flat file we offered. Changes to Required, Conditional and Optional fields are communicated by Accessible Letters available at CLEC On-Line at https://clec.att.com/clec/access_letters/search.cfm. Using the changes communicated, the CLEC would then make changes to the Word document to keep it up to date for their own use.

2. Please provide copies of all accessible letters and any additional information provided to CLECs regarding the retirement of the LOH R/C/O tables.

Response: Introduction of the Southeast LSOR and eventual replacement of the LOH (including the R/C/O tables) was introduced at the April 9, 2008 Change Control Process Meeting, subsequent Change Management Meetings and Accessible Letters.

See Accessible Letters:

CLECSE08-051	04/23/08
CLECSE08-135	08/20/08
CLECSE09-049	03/18/09
CLECSE09-005	06/05/09
CLECSE 09-021	07/17/09
CLECSE09-123	07/24/09
CLECSE09-022	09/30/09 ¹
CLECSE09-180	10/26/09 ²
CLECSE09-005	11/14/09
CLECSE09-024	11/20/09
CLECSE10-001	02/03/10
CLECSE10-012	02/04/10
CLECSE10-002	02/05/10
CLECSE10-004	03/19/10
CLECSE10-003	06/02/10
CLECSE10-138	10/13/10 ³

In addition, after each Requirements Accessible Letters, AT&T hosted CLEC Requirements "Walk Through" meetings.

3. Has STS submitted a change request through CMP regarding this issue? If so, what was AT&T's response?

Response: Yes, STS has submitted a Change Request. AT&T denied the Change Request due to cost, however AT&T offered a one-time flat file of the existing R/C/O tables in a Microsoft Word format and CLECs can update the document as changes are introduced to the LSOR. AT&T made this offer at the September 15, 2010 Change Management Meeting. While a few CLECs requested the file, STS did not.

¹ Accessible Letter states "As discussed in several Change Management meetings, the R/C/O tables in Section 3 of the LOH are migrating to the LSOR." "In this effort, each field is reviewed and the data within the R/C/O table is moved into the field pages of each identified product."

² Accessible Letter states "The LOH (Local Ordering Handbook) will remain on CLEC Online but will not be updated for the March 2010 Release. It will be removed with the July 2010 Release."

³ Offered R/C/O table in Microsoft Word format to all CLECs

Attachment A

***Migrations to Commingled UVL-SL2 Loop with Number Portability
CLEC Information Package***

April 26, 2010

Version 1.1

Table of Contents

REVISION HISTORY	9
1. INTRODUCTION & SCOPE.....	10
2. CONTRACT REQUIREMENTS.....	10
3. MIGRATION LSR REQUIREMENTS.....	10
4. LSR EXAMPLE.....	12

Revision History

DATE	REVISION
4/15/10	Initial Version 1
4/26/10	Version 1.1 revised section 2 Contract Requirements to include the term commingling

1. Introduction & Scope

This document is intended to provide ordering instructions for migrations to Commingled UVL-SL2 Loops with Number Portability.

2. Contract Requirements

CLECs must have an executed Interconnection Agreement (ICA) that includes terms and conditions for commingling.

3. Migration LSR Requirements

These LSR requirements are for the migration of existing **non-complex** services to a commingled UVL-SL2 Loop with Local Number Portability (LNP). The LSR may be submitted electronically or manually per the following instructions:

- A UVL-SL2 Loop will be provided with each ported telephone number associated with the basic Resale / WLP / LWC™ / Retail POTS Service
- Complex Resale or Wholesale Local Platform (WLP) / Local Wholesale Complete™ (LWC™) / Retail accounts cannot be migrated pursuant to this migration process, e.g. Centrex, DID, ISDN PRI/BRI, 2-Wire ISDN/BRI Digital Loop and Port UNE Combination, 4-Wire ISDN/PRI Digital Loop & Port UNE Combination, UNE-P/WLP Centrex, Digital Direct Integration Termination Service (DDIT), and any other complex product not listed here
- All Existing Account Telephone Numbers (EATNs) must use the existing Regional Street Address Guide (RSAG) for a valid end-user address
- Each LSR is for the same End User (EU) and for the same EU location, served by the same Serving Wire Center (SWC)
- Each Existing Account Telephone Number (EATN) requires a single LSR
- All Loops on the LSR must reflect the same NC/NCI/SECNCI
- The Special Access (SPA) DS1 Interoffice Transport facility intended for commingling must be in place prior to UVL-SL2 migration LSRs are submitted; the DS1 SPA Transport multiplexer must be in the EU SWC
- No End User moves or changes of address will be allowed
- Standard due date interval is applicable. Refer to "LSRs for Combined Services" in the AT&T Southeast Interval Guide (aka "LOH Section 9 Interval Guide") in CLEC Online.

Note: In addition to the standard LSR information found in the LSOR for REQ TYP BB, CLECs will use the following information when preparing the Migration LSR:

LSR Field	Requirement	
REQTYPE	BB	
ACT	V	
NC	LY--	
NCI	02QC3.OOD	Loop Start (Note: LSC will apply appropriate NCI code provided in the Remarks)
	02QC3.OOB	Ground Start (Note: LSC will apply appropriate NCI code provided in the Remarks)
SECNCI	02LS2	Loop Start
	02GS2	Ground Start
Cable ID/Chan Pair	CABLE ID: PXXX1 (must populate PXXX1 as shown here) CHAN/ PAIR: 00 (must populate 00 as shown here)	
RMKS	<p>SPECIAL HANDLING must be the first entry in the Remarks field followed by the CFA to be used for this arrangement as documented in the SE Special Handling document in CLEC Online.</p> <p>CLECs will provide a CFA for each circuit requested. The first CFA should be a complete CFA and include the NCI. Each CFA for each LNA thereafter (without NCI) should be complete unless there is a character limitation which would then necessitate CLECs to provide only what is different from the first CFA.</p> <p>The first CFA provided will be used for the first LNA and the second CFA will be used for the second LNA and so on.</p> <p>The valid NCI (from the CFA) to be placed in the Remarks supporting this ordering is one of the following:</p> <p>04QB9.11 04QB6.31 04QB6.33</p>	

4. LSR Example

For a sample LSR, refer to the Product/LSR Examples Search Tool in CLEC Online at:

CLEC Online - <https://clec.att.com/clec/>

Select Product/LSR Examples (left-hand lower Menu Bar)

Select LSOR Version

Select Region: Southeast

Select State

Select Product Classification: UNE

Select Product: Loop with Number Portability (LSNP)

Select Scenario: "SE – Migration to a Commingled UVL-SL2 Loop with Number Portability."